

2

(SPACE BELOW FOR FILING STAMP ONLY)

1 WALTER WILHELM LAW GROUP  
2 A Professional Corporation  
3 Riley C. Walter #91839  
4 Kathleen D. DeVaney #156444  
5 Danielle J. Bethel #315945  
6 205 East River Park Circle, Ste. 410  
7 Fresno, CA 93720  
8 Telephone: (559) 435-9800  
9 Facsimile: (559) 435-9868  
10 E-mail: [rileywalter@w2lg.com](mailto:rileywalter@w2lg.com)

11 Chapter 9 Counsel for Tulare Local Healthcare District

12 MCCORMICK BARSTOW, LLP  
13 Todd A. Wynkoop #308845  
14 Benjamin T. Nicholson #239893  
15 Benjamin E. Ladd #320466  
16 7647 N. Fresno Street  
17 Fresno, CA 93720  
18 Telephone: (559) 433-1300  
19 Facsimile: (559) 433-2300  
20 E-mail: [todd.wynkoop@mccormickbarstow.com](mailto:todd.wynkoop@mccormickbarstow.com)

21 District Counsel for Tulare Local Healthcare District

22 IN THE UNITED STATES BANKRUPTCY COURT  
23 EASTERN DISTRICT OF CALIFORNIA  
24 FRESNO DIVISION

25 In re

26 CASE NO. 17-13797

27 TULARE LOCAL HEALTHCARE  
28 DISTRICT, dba TULARE  
REGIONAL MEDICAL CENTER,

DC No.: WW-44

Chapter 9

29 Debtor.

Date: September 13, 2018

Time: 9:30 a.m.

Place: 2500 Tulare Street

Fresno, CA 93721

Courtroom 13

Judge: Honorable René Lastreto II

30 MOTION FOR ORDER AUTHORIZING REJECTION OF CERTAIN EXECUTORY  
31 CONTRACTS (GUPTA-KUMAR MEDICAL PRACTICE ASSOCIATES, INC., PARUL  
32 GUPTA, M.D.)

33 TO THE HONORABLE RENÉ LASTRETO II, UNITED STATES BANKRUPTCY  
34 JUDGE:

1 Debtor, Tulare Local Healthcare District, doing business as Tulare Regional  
2 Medical Center ("Debtor" or the "District") hereby moves the Court, pursuant to 11  
3 U.S.C. § 365 and B.R. 6006, for entry of an order:

4 1. Authorizing the District to reject executory contracts<sup>1</sup> ("Designated  
5 Contracts") identified in Exhibit "A" ("Exhibit 'A") of the annexed "Declaration of Sanford  
6 Haskins" ("Declaration"). Such rejection will be effective upon entry of an Order  
7 approving this Motion.

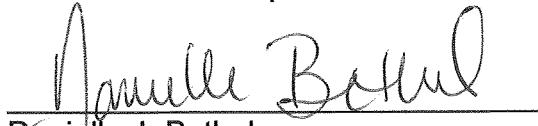
8 This Motion is based on the Motion, the Notice, Memorandum of Points and  
9 Authorities, the Declaration of Sanford Haskins in Support of the Motion, the files,  
10 pleadings and orders on file in this Chapter 9 case, and such other and further evidence  
11 as properly put before the Court.

12 WHEREFORE, the Debtor respectfully requests that the Court enter an order:  
13 (1) authorizing the rejection of the Designated Contracts; (2) fixing the date by which  
14 any claims based on this Motion must be filed; and (3) grant such other relief as is just  
15 and proper.

16 Dated: August 11, 2018

17 WALTER WILHELM LAW GROUP,  
a Professional Corporation

18 By:

19   
Danielle J. Bethel  
20 Attorneys for Debtor Tulare Local Healthcare  
21 District, dba Tulare Regional Medical Center

22  
23  
24  
25  
26  
27 <sup>1</sup> The Designated Contracts include four (4) service agreements. While the District recognizes that the Designated  
28 Contracts may not constitute "executory contracts" within the meaning of 11 U.S.C. § 365, the District wishes to reject  
the Designated Contracts nonetheless out of an abundance of caution and for the avoidance of any doubt.